

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

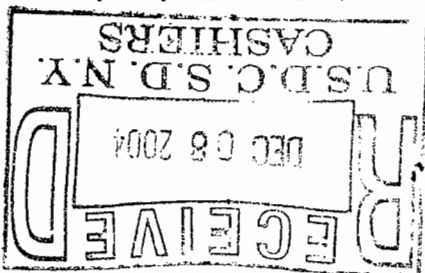
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SCAN CHART K/S,
:

Plaintiff,
:

-against-

: WAJILAM EXPORTS (SINGAPORE) PTE, LTD.,
:

: Defendant.
:-----X



ANSWER

04 CIV. 9193 (DAB)

Defendant Wajilam Export (Singapore) Pte, Ltd., by

its attorneys Cardillo & Corbett, answers the complaint in

this action, as follows:

1. Admits the allegations of paragraph "1" of the

complaint.

2. Denies knowledge or information sufficient to

form a belief of the truth of the allegations of paragraph "2"

of the complaint, except defendant admits, on information and

belief, that plaintiff was the disponent owner of the M/V

MILLS.

3. Admits the allegations of paragraph "3" of the

complaint.

4. Admits the allegations of paragraph "4" of the

complaint.

5. Admits the allegations of paragraph "5" of the

complaint.

6. Denies that there is any debt owed by the

defendant to the plaintiff, as alleged in paragraph "6" of the

complaint.

7. Denies that defendant breached the charter, as alleged in paragraph "7" of the complaint.

8. Admits the allegations of paragraph "8" of the complaint.

9. Admits the allegations of paragraph "9" of the complaint.

10. Denies the allegations of paragraph "10" of the complaint, except that defendant admits that interest, costs and attorneys' fees are usually awarded to the prevailing party under English law.

11. Denies the allegations of paragraph "11" of the complaint, except defendant admits that prior to the service of the within answer on the plaintiff defendant could not be found within the Southern District of New York, within the meaning of Rule B of the Supplemental Rules for Certain Admiralty and Maritime Claims.

12. Admits that plaintiff sought an order of this court, as recited in paragraph "12" of the complaint.

WHEREFORE, defendant prays that:

A. pursuant to 9 U.S.C. §201 and Article II.3. of the Convention on the Recognition and Enforcement of Foreign Arbitral Awards, that plaintiff and defendant be referred to arbitration in London of the disputes alleged in the complaint; and

B. the within action be stayed pending the outcome of arbitration; and

C. that defendant have such other relief as this court may deem must and proper.

Dated: New York, New York
December 8, 2004

WATIAM EXPORT (SINGAPORE) PTE, LTD.

By:

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